

March 28, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

In Re: Dominion Energy South Carolina, Incorporated's Annual Update on Demand Side
Management Programs and Petition to Update Rider
Docket 2022-52-E

Dear Ms. Boyd:

On behalf of the South Carolina Coastal Conservation League and Southern Alliance for
Clean Energy, please find a *Petition to Intervene* attached for electronic filing in the above-
referenced docket.

Please contact me if you have any questions regarding this filing.

Sincerely,

s/Emma Clancy
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*Counsel for South Carolina Coastal Conservation
League and Southern Alliance for Clean Energy*

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2022-52-E

In the Matter of:)	
)	
Dominion Energy South Carolina,)	
Incorporated's Annual Update on)	PETITION TO INTERVENE
Demand Side Management)	
Programs and Petition to Update)	
Rider)	
)	

The South Carolina Coastal Conservation League (“CCL”), and Southern Alliance for Clean Energy (collectively, “Petitioners”), through counsel, hereby petition the South Carolina Public Service Commission (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On January 31, 2022, Dominion Energy South Carolina, Inc. (“DESC” or “Company”) filed an Annual Update on Demand Side Management Programs and a Petition to Update Rider. In its filing, DESC: (1) submits for the Commission’s review information concerning the current status of DESC’s demand reduction and energy efficiency (“DSM/EE”) programs and (2) petitions the Commission for authorization to update its “Rider to Retail Rates – Demand Side Management Component” (“DSM Rider”) to provide for the recovery of costs and net lost revenues associated with its DSM programs and the Commission-approved shared savings incentive for investing in such programs. The proposed rider will be implemented in the first billing cycle of May 2022.

2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. As an advocate for demand side management and energy efficiency, CCL and its members support the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from DESC and would be subject to the impacts of the Company's DSM/EE programs and proposed DSM Rider. CCL was a party to Docket No. 2009-261-E, and to the settlement agreement adopted and approved by the Commission in Order No. 2010-472, in which the Commission approved DESC's initial DSM/EE programs and rider. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29403.

3. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. SACE has members who receive electricity service from DESC and would be subject to the impacts of the Company's DSM/EE programs and proposed DSM Rider. SACE and its members are interested in promoting greater reliance on demand side management and energy efficiency to meet South Carolina's energy needs. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

4. Petitioners have participated in prior DESC annual DSM/EE update dockets, including Docket Nos. 2011-49-E, 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, 2018-42-E, 2021-34-E. In addition, Petitioners participated in Docket No. 2013-208-E, in which DESC's current cost-recovery and incentive mechanism was established, and 2019-239-E, in which DESC expanded its DSM portfolio and

modified its DSM Rider. Petitioners also participate in the DESC Demand Side Management Advisory group process established in Docket No. 2009-261-E and the Energy Efficiency Advisory Group established through Order 2020-832 in Docket No. 2019-226-E.

5. Petitioners seek to intervene in this proceeding to advocate for their members' interests in promoting energy savings through demand side management and energy efficiency. If allowed to intervene, Petitioners will submit comments and/or testimony and participate in a public hearing, should the Commission decide to hold one.

6. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 28 day of March, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* on behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy in Docket No. 2022-52-E.

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This 28th day of March, 2022.

s/ Emma Clancy